

1 NICHOLAS A. TRUTANICH  
2 United States Attorney  
3 DEBORAH LEE STACHEL  
4 Regional Chief Counsel, Region IX  
5 Social Security Administration  
6 MICHAEL K. MARRIOTT, CSBN 280890  
7 Special Assistant United States Attorney  
8 160 Spear Street, Suite 800  
9 San Francisco, California 94105  
10 Telephone: (415) 977-8985  
11 Facsimile: (415) 744-0134  
12 E-Mail: [Michael.Marriott@ssa.gov](mailto:Michael.Marriott@ssa.gov)

13 Attorneys for Defendant

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**  
**LAS VEGAS DIVISION**

RHONDA R. HESS, ) Case No: 2:18-cv-02431-JAD-CWH  
Plaintiff )  
v. )  
NANCY A. BERRYHILL, Acting ) **STIPULATION FOR EXTENSION OF**  
Commissioner of Social Security, ) **TIME TO FILE DEFENDANT'S CROSS**  
Defendant. ) **MOTION TO AFFIRM**  
)  
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Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of thirty days to Monday, July 15, 2019, to prepare and file her cross motion to affirm. This is the Commissioner's second request for an extension.

Defendant respectfully requests this extension of time because of a very heavy workload, as a result of an increase in case receipts and multiple extended absences from the office, leading to more than twelve district court merits briefs being due in the next month.

On June 17, 2019, Plaintiff's counsel informed Defendant by email that he had no objection to this extension.

Respectfully submitted,

Date: June 17, 2019

## LAW OFFICES OF LAWRENCE D. ROHLFING

By:

/s/\* Cyrus Safa

CYRUS SAFA

\*authorized by email June 17, 2019

Attorney for Plaintiff

Date: June 17, 2019

NICHOLAS A. TRUTANICH

## United States Attorney

By:

/s/ Michael K. Marriott

MICHAEL K. MARRIOTT

## Assistant Regional Counsel

Attorneys for Defendant

Of Counsel

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Jeffrey Chen

## Assistant Regional Counsel

## Social Security Administration

IT IS SO ORDERED.

DATE: June 18, 2019

HONORABLE CARL W. HOFFMAN  
United States Magistrate Judge

## **CERTIFICATE OF SERVICE**

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Cyrus Safa  
Law Offices of Lawrence D. Rohlfing  
12631 E. Imperial Highway, Suite C-115  
Santa Fe Springs, CA 90670

Date: June 17, 2019

NICHOLAS A. TRUTANICH  
United States Attorney

By: /s/ Michael K. Marriott  
MICHAEL K. MARRIOTT  
Assistant Regional Counsel

Attorneys for Defendant